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Ref: 8EPR-N

Dale Deiter, District Ranger
Jackson Ranger District
USDA Forest Service
c/o Steve Markason
Bridger-Teton National Forest
25 Rosencrans Lane
P.O. Box 1689
Jackson, Wyoming 83001

Re: Draft Environmental Impact Statement for the Teton to Snake Fuels Management Project; CEQ # 20150210

Dear Mr. Deiter:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service's (USFS's) Draft Environmental Impact Statement (EIS) for the Teton to Snake Fuels Management Project (Project). The Project area is located on the Bridger-Teton National Forest in Teton County, west of Jackson, Wyoming. Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA).

Project Background

The USFS proposes to reduce potential fire behavior and enhance public and firefighter safety using mechanical thinning (commercial and noncommercial) and prescribed fire methods in selected areas in the wildland-urban interface (WUI). These actions would include the road work, landings, and fire control lines needed to conduct the proposed thinning and prescribed fire treatments. The WUI boundary spans almost 40 miles along national forest systems lands. Additionally, a portion of the Palisades Wilderness Study Area occurs within this WUI. According to the Draft EIS, the Teton to Snake WUI area is one of the highest fire risk areas on the Bridger-Teton National Forest due to a combination of high density housing adjacent to the forest boundary, the forest fuel conditions in the area, and the prevailing winds that push wildfire toward residential areas.

The Draft EIS analyzes a no action alternative, as well as two action alternatives. Alternative 3 has been identified as the Preferred Alternative, which provides enhanced protection for special areas and wildlife habitat over the No Action alternative (Alternative 1) and the Proposed Action (Alternative 2). The Draft EIS states that Alternative 3 was designed by modifying the Proposed Action to reduce activities in the Palisades Wilderness Study Area and Inventoried Roadless Area (IRA), and to avoid goshawk habitat, whitebark pine, subalpine (boreal) forest, and old-growth habitat. Some of the main differences of the proposed activities between Alternative 2 and Alternative 3 respectively are as follows:

- Thinning: 2,526 acres vs. 1,757 acres;
  - Mechanical fuel treatment in wilderness study area: 825 acres vs. 391 acres;
  - Mechanical fuel treatment in IRA: 291 acres vs. 273 acres;
    - Unlike Alternative 2, all Alternative 3 treatments would be noncommercial thinning, hand-pile and burning without use of ground-based machinery; no timber to be removed and sold;
- Prescribed fire: 19,991 acres vs. 12,524 acres with less acreage occurring in roadless areas;
- Reduced snag density in defense zone: 37 units vs. 27 units;
- Road maintenance and reconstruction: 15.69 miles vs. 13.53 miles;
- Temporary road construction and obliteration: both are 1.07 miles;
- Fire control line construction: 11.1 miles vs. 6.8 miles; and
- Landings (#): 32 vs. 27.

No permanent or temporary road construction or reconstruction or commercial timber harvest would occur within the wilderness study area under any of the alternatives. The Draft EIS states that the project also does not include any road construction or reconstruction in the IRAs. However, portions of the power line road accessing one of the treatment units are located within the IRA. To access this unit under Alternative 2, 1.5 miles of the road within the IRA would need maintenance work versus 0.4 miles under Alternative 3. This work would involve blading, drainage, and some widening necessary to accommodate log trucks.

Comments and Recommendations

The EPA recognizes the challenge that the USFS has in reducing the risk of fire escaping outside of national forest boundaries while also providing firefighter and public safety, maintaining existing wilderness character and avoiding adverse effects from suppression activities. Alternative 3, the Preferred Alternative, appears to strike a balance between providing some beneficial reduction in fire behavior and increased safety, and reducing potential adverse effects to special areas and wildlife habitat. Our concerns and/or recommendations are primarily related to potential impacts to aquatic resources due to sediment input, as well as air resources analyses regarding climate change and greenhouse gas (GHG) emissions.

1) Aquatic Resources

The Draft EIS states that modeled erosion, sediment, turbidity and stream temperature effects would be minimal, with short-term effects occurring in streams near road work and road use. Those effects are minimized with the application of project design features and best management practices (BMPs) during implementation. No measurable effects are predicted to stream channel conditions, wetlands and springs, riparian areas, and floodplains. Watershed condition classes are predicted to be maintained or improved by reduced fire behavior and drainage improvements to existing roads. The Draft EIS states that there are no impaired or threatened streams in the project area identified on the Clean Water Act Section 303(d) list. There are three streams within the project area that are considered "functional at risk" due to impacts to the streams and riparian vegetation from roads, recreation and grazing.

According to the Draft EIS, roads are the single largest source and delivery system of sediment to stream channels, and can intercept both surface and groundwater through hillslope cuts. Surface runoff can enter streams either directly from the road surface or through drainage ditches, which can result in increased sediment delivery to streams. Mechanical vegetation treatments and prescribed burning can also contribute to sediment loading.

Recommendations

We recommend that the USFS: (1) analyze and/or clarify whether there are potential impacts to impaired water bodies not only within but also downstream of the project area (including water bodies listed on the most recent EPA-approved CWA § 303(d) list); and (2) coordinate with the Wyoming Department of Environmental Quality (WYDEQ) if there are identified potential impacts to impaired water bodies. We recommend this coordination in order to avoid causing or contributing to the exceedance of water quality standards. Where a Total Maximum Daily Load (TMDL) exists for impaired waters in the area of potential impacts, pollutant loads should comply with the TMDL allocations for point and nonpoint sources. Where new loads or changes in the relationships between point and nonpoint source loads are created, we recommend that the USFS work with WYDEQ to revise TMDL documents and develop new allocation scenarios that ensure attainment of water quality standards. Where TMDL analyses for impaired water bodies downstream of the planning area still need to be developed, we recommend that proposed activities in the drainages of CWA impaired or threatened water bodies be either carefully limited to prevent any worsening of the impairment or avoided where such impacts cannot be prevented. We recommend that mitigation or restoration activities be considered in the Final EIS to reduce existing sources of pollution, and to offset or compensate for pollutants generated.

We support the efforts of the USFS to avoid and minimize impacts through design features and BMPs. We encourage the development of an adaptive management framework, particularly one that would require regular monitoring review and evaluation of treatment effects to allow for the adjustment of management activities towards desired conditions throughout the project implementation period. We recommend providing additional detail in Appendix D for hydrological monitoring to ensure aquatic resources are routinely monitored in order to adequately evaluate the effectiveness of proposed protective measures.

2) Air Resources Analyses

The Draft EIS substantiates that the main criteria pollutant monitored for prescribed fire emissions to measure air quality is particulate matter (PM). The results of the modeled PM-2.5 emissions from prescribed burning and pile burning in the project area were a valuable addition to the Draft EIS analysis, especially considering that the Teton and Bridger Wildernesses of the Bridger-Teton National Forest and the nearby Grand Teton National Park are designated Class I Federal areas. To further enhance the air quality analysis, the EPA offers the following recommendations below.

Design Criteria and Monitoring Requirements: We support prescribed fire design criteria and monitoring requirements including: (1) incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (November 2013) into the site-specific burn plans designed for each prescribed burn conducted under this project; and (2) public notification of pending burns. We also recommend that the USFS consult with the WYDEQ for any modeling, mitigation, or other measures required under State regulations or the State Implementation Plan to address CAA requirements.

GHG Emissions and Climate Change: We note that with the exception of several brief general statements regarding climate change, the Draft EIS does not include a thorough discussion on the effects of climate change on the proposed activities and the effects of the activities on climate change. The Draft EIS states that this information is included in the Silviculture, Fuels and Climate Change Discussion report located in the project record. This report was not found online; however, some additional detail was included in the April 10, 2012 Silviculture Report posted on the USFS project

website as one of the supporting documents to the Draft EIS. We recommend that the referenced Silviculture, Fuels and Climate Change Discussion report be made easily available to the public for review through inclusion in the Final EIS.

We believe the Council on Environmental Quality's December 2014 revised draft guidance for federal agencies' consideration of GHG emissions and climate change impacts outlines a reasonable approach, and we recommend that the USFS use that draft guidance to help outline the framework for its analysis of these issues. Accordingly, we recommend the NEPA analysis include an estimate of the GHG emissions associated with the project, qualitatively describe relevant climate change impacts, and describe reasonable alternatives and/or practicable mitigation measures to reduce project-related GHG emissions. More specifically, we recommend the following approach:

- Estimate the anticipated GHG emissions associated with the Teton to Snake Fuels Management Project proposed action and alternatives. If the project is likely to have less than 25,000 metric tons of CO_2-equivalent emissions/year, then provide a qualitative estimate unless quantification is easily accomplished.

- Include a summary discussion of ongoing and reasonably foreseeable regional climate change impacts relevant to the project, based on U.S. Global Change Research Program assessments, to assist with identification of potential project impacts that may be exacerbated by climate change and to inform consideration of measures to adapt to climate change impacts. The estimated level of GHG emissions from the project and its alternatives can serve as a reasonable proxy for assessing the potential effects of the proposed action on climate change. It may also be useful to address consistency of estimated GHG emissions with any existing relevant regional, tribal or state climate change plans or goals. We do not recommend comparing GHG emissions from the proposed action to total global or U.S. emissions since climate impacts are not attributable to any single action but are exacerbated by a series of smaller decisions.

- Describe measures to reduce GHG emissions associated with the project, including reasonable alternatives or other practicable mitigation opportunities and describe estimated GHG reductions associated with such measures. We also recommend that the USFS consider, as appropriate, practicable changes to the proposal to make it more resilient to anticipated climate change.

3) Other Considerations

Special-Status and Threatened and Endangered Species: The analysis in the Draft EIS evaluates wildlife species in four categories:

- Threatened, endangered, and proposed species listed under the Endangered Species Act;
- Forest Service Region 4 sensitive species, and candidate species for federal listing;
- Bridger-Teton National Forest management indicator species; and
- Migratory birds.

These species include but are not limited to the Canada lynx, Gray wolf and Grizzly bear. We understand that the USFS has conducted formal consultation with the U.S. Fish and Wildlife Service (USFWS). The Draft EIS summarizes the detailed analysis of effects in the wildlife report and biological assessment located in the project record. To best inform the decision-maker and the public, we recommend the NEPA documentation include any USFWS recommendations to reduce potential impacts to these species including project design criteria, mitigation, conservation measures and monitoring measures that may be included in the project record. The results of the USFWS discussions

and subsequent recommendations will be a valuable addition to the Final EIS.

Closing

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed Project, the EPA is rating the Draft EIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses, or discussion that we recommend for inclusion in the Final EIS. A description of the EPA's rating system can be found at: http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria.

We appreciate the opportunity to participate in the review of this project, and are committed to working with you as you prepare the Final EIS. If we may provide further explanation of our comments during this stage of your planning process, please contact me at 303-312-6704, or your staff may contact Melanie Wasco, Lead NEPA Reviewer, at 303-312-6540 or wasco.melanie@epa.gov.

Sincerely,

Philip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation